

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
	)	
v.	)	Case No. 1:09-cr-10120-MBB
	)	
JEREMY JETHRO	)	
	)	
Defendant.	)	

**JOINT MOTION TO CONTINUE AND FOR CONSOLIDATION**

The United States, by and through its undersigned counsel, and Stacey Richman, counsel for defendant Jeremy Jethro, file this Joint Motion to Continue and for Consolidation.

Stacey Richman is admitted to practice in the States of New York, New Jersey and California and will be seeking admission to this Court Pro Hac Vice to represent defendant Jeremy Jethro. In accordance with the Local Rules of this Court, she has applied for certificates of good standing from the state and federal jurisdictions before which she has been admitted. Unfortunately, the certificates of good standing have not yet arrived from California and New Jersey.

The parties request a continuance until June 24 or 25, 2009, to enable Ms. Richman to establish her good standing in these other Districts and to appear Pro Hac Vice on behalf of the defendant. She has arranged for local counsel to propose her admission, once the certifications are received.

The parties also request that the defendant be permitted to enter his plea of guilty on the day of his initial appearance. The parties have entered into a plea agreement, pursuant to which the defendant has agreed to plead guilty to the misdemeanor charged in this case. The defendant

and defense counsel must travel to the Court from New York for each appearance, and this will reduce significantly the cost to them.

The parties apologize to the Court for the lateness of the filing of this Motion.

Respectfully submitted,

MICHAEL K. LOUCKS  
Acting United States Attorney

By: /s/ Stephen P. Heymann  
Stephen P. Heymann  
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I, Stephen P. Heymann, Assistant U.S. Attorney, certify that I caused the above Joint Motion to be served by first-class mail on the defendant's attorney on May 27, 2009.

/s/ Stephen P. Heymann  
Stephen P. Heymann  
Assistant U.S. Attorney